

Annex A Response to Departmental Comments

**S.16 Planning Application for Proposed Residential Institution (Student Hostel) in “Residential (Group C)”
with a minor portion within “Green Belt” Zones at Middleton Towers, 140 Pok Fu Lam Road (Rural Building Lot No. 825 RP)
and adjoining Government Land, Pok Fu Lam, Hong Kong**

Responses to Departmental Comments (2nd Batch)

Item	Bureau/Department	Date
1.	Water Services Department	2 June 2026
2.	Lands Department	25 June 2026

Response to Departmental Comments – Application No. A/H10/98

Item	Comments Received	Responses
1.	Chief Engineer/Water Services Department (Received via email from PlanD dated 2.6.2026) (Contact Officer: Mr. Terry C.W. LAW, tel: 2152 5737)	
1.1.	Please note the comments from water supply system planning point of view:- Our comment no. 3 "For salt water unit demand, please adopt our latest ceiling value of 100 l/h/d (per residential population)....." provided in our email to you on 15 April 2026, was not addressed in this submission. Please revise.	Noted and updated accordingly.
1.2.	It is noted in this application that the application site, which is currently used for staff quarter purpose, is proposed to transform into student hostels by internal re-partitioning. Please provide the net increase / decrease in the fresh water / flushing water demands due to the proposed re-development, for consideration.	The net increase / decrease in the fresh water/ flushing water demands were included in the section 2.3 in the submitted WSIA for your perusal.
2.	Lands Department (Received via email from PlanD dated 25.6.2026) (Contact Officers: Ms. Ming TSANG, tel: 2835 1718)	
2.1.	The subject existing development namely "Middleton Towers" falls within Rural Building Lot ("RBL") No. 825 RP ("the Lot"). The Lot is held under the Government Lease dated 22.5.1970 for a term of 150 years from 17.3.1884 (i.e. expiry on 16.3.2034). The Lot is restricted to be used for housing the staff and employees of the Lot owner and dependent members of the families of such staff and	Noted, and the applicant is currently following up with Lands Department on necessary lease waiver application on the identified matters.

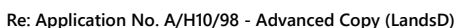
Item	Comments Received	Responses
	employees, non-paying guests and domestic servants employed by them or by the Lot owner. Other salient lease conditions of the Lot include but are not limited to:- (i) Height: not exceeding 12 storeys in height (Remarks: properly accessible car ports at ground floor level could be exempted from this height restriction) (ii) Non-building area: red hatched black area (iii) Non-exclusive right of way: brown area (iv) Roof-over area: different % requirement depending on the number of storeys (in particular not exceeding 17.5% of the Lot area (including the area of the red hatched black area) applicable to a 8-12 storey building) (v) Parking requirement: at the rate of not less than one car per flat (vi) Requirement of design, disposition and height (vii) Restriction on alienation (viii) Non-offensive trades clause	
2.2.	The Lot is also subject to a temporary waiver dated 23.3.2005 for a term of two years commencing from 1.4.2005 to 31.3.2007 and thereafter quarterly to permit underletting of quarters erected on the Lot to any person or persons.	Noted.
2.3.	The proposed conversion of the existing development to student hostel with ancillary facilities does not comply with some of the existing lease conditions. A lease modification is required for implementation of the subject proposal. However, there is no guarantee that the lease modification application will be approved. The lease modification application will be considered by Lands Department acting	Noted.

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	in the capacity as the landlord at its sole discretion. In the event that the lease modification application is approved, it will be subject to such terms and conditions as the Government shall see fit, including among others, payment of premium and administrative fee as may be imposed by Lands Department.	
2.4.	The boundary of "the Application Site" shown on Site Plan and Master Layout Plan does not merely include the Lot and the Brown Area (i.e. the existing non-exclusive right of way granted to the Lot owner under lease) but it also involves some additional Government land. According to the Response to Departmental Comments at Appendix VI of the Submission, the applicant explains that (i) the Government land currently functions as a service road and is related to the existing and proposed site access arrangements and (ii) is therefore included into the application site to allow a holistic assessment of traffic and access arrangements. Should the said additional Government land (or any part thereof) be required for access purpose, the extent and alignment of the Brown Area of the Lot would need to be modified. Similarly, there is no guarantee that the modification of the Brown Area (if submitted) will be approved and it will be subject to such terms and conditions as the Government shall see fit.	We would like to clarify that the area falling within Government land between the Lot currently serves as a service road (the Right of Way under RBL No. 825 RP) and encompasses existing slope and landscaped areas. It has been included within the application boundary to facilitate a more holistic assessment of traffic and access arrangements. There is no proposal to modify the extent or alignment of the existing right of way. As per reply from LandsD via email dated 30 June 2026 in Annex II , the Authority has no further comments.
2.5.	By referring to the Master Layout Plan, apart from a vehicular access point (for egress only) which fronts directly on Pok Fu Lam Road, there is another vehicular access point nearby (for both ingress and egress) which is intended to link with the adjacent "High West Development". Such adjacent	We would like to clarify that the vehicular access point linking with the adjacent High West Development (RBL No. 1192) would only serve for ingress only. Relevant annotation in the MLP has been revised in Annex I . As per reply from LandsD via email dated 30 June 2026 in Annex II , the Authority has no further comments.

Item	Comments Received	Responses
	development falls within another private lot namely RBL No. 1192. According to Special Condition No. (25) of the lease governing RBL No. 1192, such access point (for both ingress and egress) shown on the Master Layout Plan in fact is restricted merely for egress. Besides, the lease of RBL No. 1192 has not reserved right of access in favour of the Lot to pass through RBL No. 1192.	
2.6.	It is noted that the applicant has proposed in Section 7 of the Application Form under the Submission a tentative completion year of the development proposal in 2028. This office is not in a position to comment.	Noted.
2.7.	Given the various technical assessments in the Appendices of the Submission are technical in nature, I shall defer to other relevant departments to comment.	Noted.

Annex I Supplementary Master Layout Plan

Annex II Email Correspondence with Lands Department



Date Tue 6/30/2026 5:31 PM

To [REDACTED]

Cc: [REDACTED]

1 attachment (511 KB)

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Dear Winnie.

I refer to our earlier verbal discussion on the captioned.

Please find my preliminary comments below on your response as enclosed in your email dated 26.6.2026 ("R-to-C")-

Item 7.4 of the R-to-C

While noting that you have no proposal to modify the extent or alignment of the existing right of way (i.e. the Brown Area under the Lease), please note that our comments shall remain valid.

Item 7.5 of the R-to-C

Given the vehicular access point linking with adjacent RBL No. 1192 would serve for ingress only as per the updated Master Layout Plan (Annex II of the R-to-C), preliminarily I have no further comment on such proposal.

Items 7.1, 7.2, 7.3, 7.6 and 7.7 of the R-to-C

While noting your response on the captioned items, please note that our comments shall remain valid.

Regards,
Wallis LI
ES/PFL (Atg.), DLO/HKW&S
Lands Department
Tel: 2835 1605

From: [REDACTED]

Sent: Friday, June 26, 2026 1:46 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Application No. A/H10/98 - Advanced Copy (LandsD)

Dear Mr. Tsang,

With reference to the captioned Section 16 Planning Application for the Proposed Residential Institution (Student Hostel) at Middleton Towers, 140 Pokfulam Road (RBL No. 825 RP) (Application No. A/H10/98), we acknowledge receipt of your comments via the Planning Department on 25 June 2026.

Please find enclosed our responses for your preliminary review prior to formal submission to the Town Planning Board. We would particularly draw your attention to Items 7.4 and 7.5, which include further clarifications.

Should you have any queries, please feel free to contact us for further discussion.

In light of the tight schedule leading up to the TPB meeting on **10 July 2026**, we would be grateful if you could provide your confirmation of no further comments by **30 June 2026**.

Kind Regards,

Winnie Hung

[illegible]